

City and County of San Francisco



Office of the General Manager
H. DANIEL McFARLAND

**DEPARTMENT OF ELECTRICITY
AND TELECOMMUNICATIONS**

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901 Rankin Street
San Francisco, California 94124
(415) 550-2720

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FEB 26 1993

FCC MAIL ROOM

February 24, 1993

Office of the Secretary
Federal Communications Commission
Washington, DC 20554

Re: FCC Docket 92-235

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FEB 26 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Commissioners:

The Federal Communications Commission's adoption of PR Docket 92-235 will seriously impact the City and County of San Francisco's ability to provide uninterrupted, continued, reliable protection to the life and property to the citizens of San Francisco. Should this proposal become effective, the City and County of San Francisco's radio communications systems, which is essential in delivering Public Safety services will be degraded..

The City and County of San Francisco laud the Commission in its attempts to move forward in reviewing the rules and regulation governing the limited radio frequency spectrum. However, we strongly protest the technical standards about to be imposed. The geographic makeup of San Francisco is 49 square miles with natural topography of hills and deep valleys, surrounded by water on three sides. San Francisco is also a metropolitan City with a high volume of commercial buildings that requires Public Safety services. The proposed technical requirement of maximum effective radiated power based on antenna height above average terrain, will require 55 of our primary Public Safety transmitters to be reduced to 5 watts. Our current effective radiated power of 100 watts, already has difficulty meeting the service area radio communication demands of Public Safety agencies

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and departments. The drastic reduction of the City's communication transmitters to 5 watts will greatly reduce our ability to safely deliver police protection, fire, and health services to our citizens.

If Part 88 becomes effective, San Francisco will be burdened with approximately \$11.5 million to meet the Commission's technical requirements. This includes the implementation of simulcast systems to restore the City's existing Public Safety radio communication systems to its current reliability.

The City and County of San Francisco urges the Federal Communications Commission to reconsider the heavy impact of the technical standards, both operational and financial, that the Commission is about to implement.

Sincerely,



Lorenzo W. Garde
Radio Division Manager

FOR:

H. Daniel McFarland
General Manager